

Exhibit M

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

KIMBERLY COLLINS,

Plaintiff,

vs. C.A. NO.: 2:15-cv-4465-PMD-BM

CHARLESTON PLACE, LLC, d/b/a BELMOND CHARLESTON
PLACE,

Defendant.

DEPOSITION OF: JENNIFER CASSELLI

DATE: October 12, 2016

TIME: 9:47 AM

LOCATION: HITCHCOCK & POTTS
31 Broad Street, 2nd Floor
Charleston, SC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: JANE MESSINEO, Registered
Professional Reporter, CSR-NJ

A. WILLIAM ROBERTS, JR., & ASSOCIATES

Fast, Accurate & Friendly

Charleston, SC	Hilton Head, SC	Myrtle Beach, SC
(843) 722-8414	(843) 785-3263	(843) 839-3376

Columbia, SC	Greenville, SC	Charlotte, NC
(803) 731-5224	(864) 234-7030	(704) 573-3919



A. WILLIAM ROBERTS, JR., & ASSOCIATES (800) 743-DEPO
scheduledepo.com

Collins, Kimberly v
Charleston Place, LLC

Jennifer Casselli
October 12, 2016

81

1 Let me have you look at the bottom
2 portion of this exhibit, Exhibit 6.

3 Do you recognize Plaintiff's Exhibit 6?

4 A. Yes, sir.

5 Q. This is an e-mail from Leon to you and
6 Carol; correct?

7 A. Yes, sir.

8 Q. And it's dated April 14, 2015, the day
9 after the protest, the day after the conversation
10 that Kim had in the cafeteria; right?

11 A. Yes, sir.

12 Q. Would you have received this e-mail
13 from Leon on or about April 14, 2015?

14 A. Yes, sir.

15 Q. Would you have read it?

16 A. Yes.

17 Q. Had you talked to Leon before you
18 received this e-mail?

19 A. I don't think that I did.

20 Q. Okay. Leon is saying: I don't know if
21 we have any option.

22 Do you see where he says that?

23 A. Yes, sir.

24 Q. Do you know what he meant by that?

25 A. I don't.

Collins, Kimberly v
Charleston Place, LLC

Jennifer Casselli
October 12, 2016

119

1 Q. What is it?

2 A. A termination checklist for [REDACTED]

3 [REDACTED].

4 Q. Did you fill this out?

5 A. Yes, sir, except for the benefits part
6 and the HR manager part.

7 Q. You would have filled out the top?

8 A. Yes, sir.

9 Q. On the first page?

10 A. Yes, sir.

11 Q. And it identifies her as a server;
12 right?

13 A. Yes, sir.

14 Q. Says that she was involuntarily
15 terminated; right?

16 A. Right.

17 Q. Talks about a date of hire, February of
18 '97; right?

19 A. Right.

20 Q. Says her race is black and she's
21 female; right?

22 A. Yes, sir.

23 Q. And this would evidence -- this
24 document in a sense, I guess, would evidence her
25 termination from Charleston Place.

Collins, Kimberly v
Charleston Place, LLC

Jennifer Casselli
October 12, 2016

120

1 A. Yes, sir.

2 (PLF. EXH. 11, Copy of letter dated
3 April 16, 2015, Bates stamped CONFIDENTIAL DEF
4 003194, was marked for identification.)

5 BY MR. POTTS:

6 Q. Marked as Plaintiff's 11 a letter dated
7 April 16, 2015 that looks like it's from you.

8 A. Yes.

9 Q. I ask you if you recognize that
10 document, Jennifer?

11 A. Yes, sir.

12 Q. Do you recognize Plaintiff's
13 Exhibit 11?

14 A. Yes, sir.

15 Q. Did you prepare that document?

16 A. Yes, sir.

17 Q. Did you sign it?

18 A. Yes, sir.

19 Q. Did you provide it to [REDACTED]?

20 A. Yes, sir.

21 Q. What's the date of this document?

22 A. April 16, 2015.

23 Q. So if we are remembering our dates
24 correctly, this would have been while Kim was
25 suspended but before she was terminated; right?

